

EXHIBIT 2

November 12, 2019, Hearing Transcript in
*Las Vegas Sun, Inc. v. News+Media Capital
Group, LLC, et al.*, Eighth Judicial District
Court Case No. A-18-772591-B

EXHIBIT 2

1 IN THE EIGHTH JUDICIAL DISTRICT COURT

2 CLARK COUNTY, NEVADA

3 LAS VEGAS SUN, INC., a)
4 Nevada corporation,)

5 Plaintiff,)

6 vs.)

CASE NO.

7 NEWS + MEDIA CAPITAL GROUP,)
8 LLC, a Delaware limited)
9 liability company; and)
10 LAS VEGAS REVIEW-JOURNAL,)
11 INC., a Delaware limited)
12 liability company,)

A-18-772591-B

DEPT. NO. 16

13 Defendants.)

14 AND RELATED COUNTERCLAIMS)
15)
16)
17)

18 REPORTER'S TRANSCRIPT OF PROCEEDINGS

19 BEFORE THE HONORABLE TIMOTHY C. WILLIAMS

20 TUESDAY, NOVEMBER 12, 2019

21 APPEARANCES:

22 For the Plaintiff:

23 LEIF REID, ESQ.
24 JORDAN SMITH, ESQ.
25 NICOLE SCOTT, ESQ.
JAMES J. PISANELLI, ESQ.

For the Defendants:

MICHAEL J. GAYAN, ESQ.
JON RANDALL JONES, ESQ.

REPORTED BY: DANA J. TAVAGLIONE, RPR, CCR No. 841

1 compelled to do that and conduct searches.

2 And if there are documents that are in
3 those individual's ESI, like you just said, it's
4 standard that that would be disclosed.

5 MR. JONES: Your Honor, here's, I guess, my
6 concern is that we had discussions about this, but I
7 don't know that we've had specifically -- and maybe
8 I'll be proven wrong here by Mr. Gayan or
9 Mr. Reid -- about a meet and confer about this
10 specific issue. There have been discussions back
11 and forth.

12 But here's an interrogatory that was
13 answered from their Interrogatories: "Please
14 identify each and every meeting between any of your
15 owners and/or executives, including Sheldon Adelson
16 and Patrick Dumont, about the redesign."

17 And then there was a number of objections
18 stated. But at the end of that answer or response
19 to No. 8, it says, quote, "without waiving these
20 objections, the defendants respond as follows:
21 Neither Mr. Adelson or Mr. Dumont attended any
22 meetings related to The Sun box redesign," end quote.

23 So we have told them that -- and they're
24 not employed by the R.J. They're third parties.
25 And by the way, I don't know that they're -- we

1 haven't identified who the owners are of the R.J.,
2 and it is my general understanding that Mr. Adelson
3 is not an owner of the R.J. Well, there's another
4 entity, News Plus Media. And so, technically, I
5 think there would have to be a subpoena to that
6 entity. I'm not trying to create additional hoops
7 here.

8 But, again, I think -- and I'm happy to
9 have a person-to-person sit-down meeting and look at
10 this and see what evidence they have that shows
11 that, somehow or other, Mr. Adelson or Mr. Dumont
12 are implicated in the redesign of The Sun box.
13 We've now stated in a interrogatory response that
14 they had nothing to do with that -- well, that they
15 were involved in no meetings. But I don't -- I
16 believe that they did not have anything to do with
17 The Sun box redesign.

18 So I get the idea that discovery is broader
19 than admissibility. But as you said, Your Honor,
20 there still has to be some connectivity before you
21 have to go off and start searching other people's --
22 people who are technically third parties to the
23 litigations, the litigation -- their Electronically
24 stored Informations.

25 MR. REID: Your Honor.

CERTIFICATE OF REPORTER

STATE OF NEVADA)
)SS:
COUNTY OF CLARK)

I, Dana J. Tavaglione, a duly commissioned and licensed Court Reporter, Clark County, State of Nevada, do hereby certify: That I reported the proceedings had in the above-entitled matter at the place and date indicated.

That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcript of said proceedings is a complete, true and accurate transcription of said shorthand notes.

IN WITNESS HEREOF, I have hereunto set my hand, in my office, in the County of Clark, State of Nevada, this 18th day of November 2019.

/s/Dana J. Tavaglione

DANA J. TAVAGLIONE, RPR, CCR NO. 841